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20 UNITED STATES DISTRICT COURT
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF
24 GOVERNMENT EMPLOYEES, AFL-CIO;
25 AMERICAN FEDERATION OF STATE
26 COUNTY AND MUNICIPAL EMPLOYEES,
27 AFL-CIO; et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF DENISE NEMETH-
GREENLEAD**

DECLARATION OF DENISE NEMETH-GREENLEAF

I, Denise Nemeth-Greenleaf, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am an Industrial Program Specialist at the Department of Navy in Portsmouth New Hampshire. I have worked for the Department of Navy (“Navy”) since October of 1987. The Navy’s mission is to protect the United States, and civilian employees like myself both ensure the readiness of our warfighters and serve military families.

3. I am currently Vice-Chair of the American Federation of Government Employees Defense Conference (“AFGE DEFCON or DEFCON”). I have served various other roles at AFGE and other unions in my nearly four decades of membership.

4. DEFCON is an organization comprised of various AFGE affiliates that represent nearly 250,000 civilian employees across the Department of Defense. These employees include firefighters and police officers protecting our military installations, Program Analysts and Contracting Officers ensuring the readiness of our military equipment, childcare workers and commissary employees serving our military families, and several other hardworking professionals who serve our armed forces. Many of the employees we represent are veterans and disabled veterans who transitioned to civilian DoD employees to serve our brave warfighters.

5. In its role coordinating AFGE’s DoD affiliates, DEFCON supports AFGE affiliates with representation, guidance, advice, and training.

6. As DEFCON Vice-Chair, I regularly receive information regarding the status of AFGE’s DoD affiliates.

7. I was recently informed that the Department of Navy intends to terminate all probationary firefighters at naval installations early next week. Most naval installations employ their

1 own firefighters. These firefighters are trained to work on naval installations and have the skills and
2 training required to deal with emergencies that are particular to the Navy.

3 8. Civilian firefighters at military installations are essential to ensuring the safety of
4 military personnel and their families, as well as protecting other military assets. The termination of all
5 probationary firefighters will have a detrimental effect on the Navy's ability to perform its mission and
6 protect the military personnel and families that live and work on the many naval facilities across the
7 United States. Personally, I fear that these actions will adversely affect my safety when performing my
8 duties at the Portsmouth Naval Shipyard.

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10 9. In addition to the civilian firefighters, I understand both based on information I have
11 received and news reporting, that thousands of additional DoD employees will be terminated next
12 week.

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14 10. I understand that DoD, including the Navy, was instructed to engage in the mass firing
15 of probationary employees by the Office of Personnel Management ("OPM"). It is my understanding
16 that the various DoD branches did not wish to conduct mass scale firings and are concerned about the
17 adverse effects of these terminations.

18 11. These terminations will not only adversely affect the entire United States but will also
19 have a detrimental effect on AFGE, including DEFCON and the AFGE affiliates we coordinate.

20 12. As DEFCON Vice-Chair, I have worked long days beyond my tour of duty, using
21 personal time to assist and prepare members and affiliates for the prospect of these terminations. I have
22 worked constantly since we learned of the potential terminations last week. The demands placed on my
23 time to respond to affiliate inquiries about the mass termination have required me to set aside the
24 representation needs of other affiliates and have interfered with my ability to carry out other important
25 duties I have as DEFCON Vice-Chair.
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1 13. Members of the AFGE's DoD affiliates pay voluntary membership dues to the AFGE
2 that help fund DEFCON. DEFCON's budget will be severely negatively impacted by a loss of dues
3 because of the terminations of probationary employees. This will also diminish the union's bargaining
4 power.

5 14. Members have informed me that they are very concerned about the possibility of
6 termination. They are not only scared for themselves but are concerned about the safety implications
7 for others.

8 15. Unless this Court intervenes to prevent or reverse the terminations of DoD civilian
9 employees, AFGE and our members will be severely and irreparably harmed.

10 I declare under penalty of perjury under the laws of the United States that the foregoing is true
11 and correct. Executed on February 22, 2025, in Kittery Point, Maine

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17 *Denise Nemeth-Greenleaf*
18 *February 22, 2025*

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21 Denise Nemeth-Greenleaf
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